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2008 JAN 23 PM 3:33
CLERK OF COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY KMY DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA,) Criminal Case **'08 CR 0211BTM**
)
Plaintiff,) I N D I C T M E N T
)
v.) Title 21, U.S.C., Secs. 952 and
) 960 - Importation of Cocaine;
GUADALUPE) Title 21, U.S.C., Sec. 841(a)(1) -
) Possession of Cocaine with
HERAS DE MELO-SAMPER (1),) Intent to Distribute; Title 18,
ERICK MELO-SAMPER HERAS (2),) U.S.C., Sec. 2 - Aiding and
Defendants.) Abetting

The grand jury charges:

Count 1

On or about December 27, 2007, within the Southern District of California, defendants GUADALUPE HERAS DE MELO-SAMPER and ERICK MELO-SAMPER HERAS did knowingly and intentionally import 5 kilograms and more, to wit: approximately 26.90 kilograms (59.18 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960, and Title 18, United States Code, Section 2.

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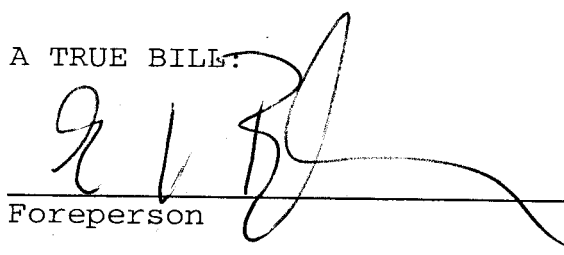
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Count 2

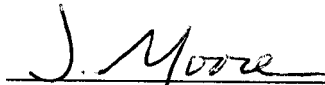
On or about December 27, 2007, within the Southern District of California, defendants GUADALUPE HERAS DE MELO-SAMPER and ERICK MELO-SAMPER HERAS did knowingly and intentionally possess, with intent to distribute, 5 kilograms and more, to wit: approximately 26.90 kilograms (59.18 pounds) of cocaine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

DATED: January 23, 2008.

A TRUE BILL:


Foreperson

KAREN P. HEWITT
United States Attorney

By: 
JEFFREY D. MOORE
Assistant U.S. Attorney